



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 30, 2023

**VIA ECF**

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Keshavjee, 20 Cr. 169 (NRB)**

Dear Judge Buchwald:

The defense writes with the consent of the Government and Pretrial Services to respectfully request the Court temporarily modify Mr. Hakim's bail conditions to allow Pretrial Services to remove his ankle monitor while Mr. Keshanjee receives an MRI. Once the date and time of the MRI is set, Mr. Keshavjee's Pretrial Officer will set a schedule for the removal and re-attachment of the devise. Thank you for your consideration.

Respectfully submitted,

Ian H. Marcus Amelkin  
Federal Defenders of New York, Inc.  
52 Duane Street, 10<sup>th</sup> Floor  
New York, NY 10007  
212-417-8733

Cc: AUSA Sam Adelsburg, Esq.

Endorsement

Application granted.

Naomi Reice Buchwald,  
USDT

May 30, 2023